

CA9690308730
Part A 3A



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX**

75 Hawthorne Street
San Francisco, CA 94105

**WASTE MANAGEMENT DIVISION
RCRA ENFORCEMENT OFFICE
RCRA COMPLIANCE EVALUATION INSPECTION REPORT**

Purpose:	RCRA Compliance Evaluation Inspection
Facility Location:	US Coast Guard Base Support Unit San Pedro 1001 S. Seaside Ave., San Pedro, CA 90731
U.S. EPA ID Number:	CA9690308730
Date of Investigation:	February 9, 2011
U. S. EPA Investigator:	Michael Prescott, EPA Contractor 5221 Burke Dr., Alexandria, VA 22309 (703) 373-3811
CUPA Representative:	Ruben Garcia, Hazardous Materials Specialist Los Angeles County Fire Dept 24330 S. Narbonne Ave., Lomita, CA 90717 (310) 534-6278
Facility Representatives:	Kathryn Gregory, Environmental Protection Specialist (Primary facility contact) (310) 521-6020 Courtney Jensen, MST3 Len Ringel, Asst. Engineering Officer
Report Prepared By:	Michael Prescott Robin Holloway, US EPA Region 09
Report Date:	April 15, 2011

INVESTIGATION

The purpose of the investigation was to determine the US Coast Guard (USCG) Base Support Unit (BSU) San Pedro facility's compliance with the Resource Conservation and Recovery Act (RCRA), as amended, and the regulations provided in the Code of Federal Regulations (CFR), Chapter 40, Parts 261-265, 268 and 273.

On February 9, 2011, Michael Prescott, representing the US Environmental Protection Agency (EPA), accompanied by Ruben Garcia of the Los Angeles County Fire Dept., conducted an unannounced site investigation at the USCG facility. The inspectors initially met with Ms. Gregory and Ms. Jensen to provide a brief opening conference. The inspectors explained that this was a routine inspection to determine whether or not the facility was in compliance with federal regulations concerning the proper management of hazardous wastes. The inspectors then conducted a walk-through of the facility accompanied by Ms. Gregory and Ms. Jensen. An exit briefing was held with representatives of the USCG to provide the areas of concern identified during the inspection.

REGULATORY HISTORY

USCG San Pedro (also referred to as the facility) is listed in the EPA Online Tracking Information System (OTIS) as a Large Quantity Generator (LQG). The EPA Generator ID number assigned to the location is CA9690308730. EPA's RCRAInfo database indicates a hazardous waste inspection was conducted by a local agency on July 12, 2007, with no violations identified.

FACILITY BACKGROUND AND PROCESSES

USCG San Pedro is located on Terminal Island at the Port of Los Angeles. According to Ms. Gregory, the facility has approximately 650 personnel on about 27 acres and began operation in 1933. The facility supports 11 tenant organizations, 10 of which are USCG units.

The primary waste generation activities are boat maintenance and facilities maintenance. There is also a medical clinic. Ms. Gregory reported that no vehicle maintenance was conducted on-site. She also reported that the facility had one 90-day hazardous waste Central Accumulation Area (CAA) and about 10 Satellite Accumulation Areas (SAAs), with most of the SAAs for non-RCRA, California only hazardous wastes.

The facility primarily generates used oil, diesel fuel, oily water, oily rags and absorbents, coolants, aerosol cans, and paint wastes. Based on interviews with facility personnel and a review of manifests, the facility would typically be classified as a small quantity generator (SQG) for RCRA hazardous wastes but an episodic RCRA LQG when a large boat or facility maintenance project occurs. The facility is an LQG of non-RCRA, California only hazardous waste.

WALK-THROUGH INSPECTION

The photographs referenced below are contained in the Photograph Log in Attachment 1 and are numbered in the chronological order they were taken.

Central Accumulation Area Next to Bldg. 10

The 90-day hazardous waste CAA was a covered and fenced -in area located next to Bldg. 10 (see Photo #1). A waste pickup had occurred the day before the inspection. Some containers of RCRA and non-RCRA, California only hazardous wastes had not been picked up, according to Ms. Gregory, because they were not in the paperwork for the pickup. They were properly labeled, closed, and dated (see Photos #3 and #4). There was also a container of broken spent lamps in the CAA that was labeled universal wastes but did not have a hazardous waste label (see Photo #2).

The CAA was equipped with an eye wash and shower, fire extinguisher, telephone, and an alarm that sounded at the CAA. Spill control and cleanup equipment was located in a locker at the CAA. Hazardous materials awaiting waste determinations were in the locker as well (see Photo #5).

On March 16, 2011, EPA sent USCG San Pedro a letter requesting additional information. According to their response, dated 7 April 2011 (Attachment 2), some of the materials in the locker are hazardous waste.

Bldg. 11 Sector Support

Minor equipment maintenance was conducted in this building and an aqueous parts washer was observed in the building, but no hazardous wastes were present at the time of the inspection.

Medical Clinic

Ms. Gregory reported the X-ray processors at this building were all digital and did not use chemicals. There was a small lab at the clinic which did not have any hazardous waste. In the dental clinic, amalgam wastes were collected in two containers: one was properly labeled, but one container of waste amalgam traps was not labeled (see Photo #6). According to USCG San Pedro's April 7, 2011 letter, amalgam traps are managed as hazardous waste.

Bldg. 51 MSST

According to Ms. Gregory, the unit at this location conducted minor boat maintenance, but was deployed at the time of the inspection. There were drums of used oil and filters outside the building and one of the drums was open (see Photo #7).

Bldg. 22 Station LA/LB

Two drums of used oil and oily rags were in this building, but no RCRA hazardous waste was observed.

Facilities Maintenance Shops

There were several small facilities maintenance shops including the HVAC, Carpentry, Electrical, and DC Shops, but no hazardous wastes were observed in these shops. However, in the Electrical Shop, a few loose spent lamps that were awaiting transport to the CAA (see Photo #8) were leaning against a wall. In the DC Shop, there was a trench drain marked "Drains to

Ocean” with paint stains on it (see Photo #9). Next to it were paint and mop buckets and a hose with signs of water over the drain (see Photo #10). Ms. Gregory reported that the area had been enclosed about eight months ago and she did not know if paint or mop buckets were rinsed or dumped here. The inspector explained that this drain appeared to be an illicit connection and should not be connected to a storm sewer.

In USCG San Pedro’s April 7, 2011 letter, they indicated that wash water and waste paint are never put down the storm drain.

Contractor Project at Industrial Wharf

Next to the water at the Industrial Wharf, I observed a contractor operation that Ms. Gregory explained was for recoating a boat. Brian Joyce, Safety and Environmental Coordinator for the contractor, Nautical Engineering, explained that they were removing coatings on the boat and accumulating the waste chips in a drum that was closed, labeled, and dated (see Photo #11). After the coating was removed, they would then apply a zinc primer to replace the coating.

Bldg. 14 Machine Shop

This was a large machine shop, but no hazardous wastes were observed at the time of the inspection.

RECORDS REVIEW

Hazardous Waste Manifests / Land Disposal Restriction (LDR) Forms

According to Ms. Gregory, hazardous wastes are shipped from the facility at least every 90 days through the Defense Reutilization Marketing Office (DRMO). Review of the manifests indicated wastes were picked up about every month. Manifests were reviewed back to the beginning of FY08 which indicated that the facility was typically an SQG most months for RCRA hazardous waste except for two months during this period (July 2010 and March 2009). Ms. Gregory reported they try to maintain compliance with the LQG regulations because they are typically a large quantity generator of non-RCRA, California only hazardous wastes. Ms. Gregory and Ms. Jensen manage and manifest all hazardous waste from all the tenants and contractors on the facility. No concerns were noted with the manifests or LDR forms.

Waste Determination Records

Ms. Gregory reported they did not have a formal waste profile documentation system, but that waste determination and analytical information was available for many of the waste streams. Furthermore, there were very few non-hazardous waste containers observed at the facility and most wastes are non-RCRA, California only hazardous wastes.

Weekly Inspections

Ms. Gregory reported that she and Ms. Jensen conduct inspections of the CAA at least weekly, but she did not have documentation of these inspections.

Contingency Plan

The facility had a Contingency Plan dated 4/13/05 that used the form required by the Los Angeles County Fire Department. Most of the information required by the RCRA regulations for a Contingency Plan was included in the Plan except that there were no procedures for responding to spills, fires, or explosions involving hazardous wastes. Ms. Gregory produced additional documents that had some of the required procedures and indicated that additional documents were available with additional response procedures. However, there were no references to these other documents in the Contingency Plan. In addition, the Contingency Plan listed primary and alternate Emergency Coordinators who had left the facility about four years ago (per Ms. Gregory).

Training Records

Ms. Jensen provided a certificate and outline for a 28-hour compliance workshop she attended on December 2, 2010 that addressed RCRA management topics. Ms. Jensen reported she first started working with hazardous wastes in February 2010.

Ms. Gregory last had 28-hour hazardous waste refresher training on May 14, 2008 and she provided a certificate and outline. Ms. Gregory also stated that she conducts annual hazardous waste training for facility personnel and last conducted this training in January 2010. Job descriptions for hazardous waste positions are provided in the facility's Contingency Plan.

POTENTIAL RCRA VIOLATIONS

1. Failure to Meet Hazardous Waste Container Labeling Requirements

40 CFR §262.34(d)(4) referencing (a)(3) and §262.34(c)(1)(ii)

Generators who accumulate hazardous waste on site without a permit or grant of interim status shall comply with the following requirements:

§262.34(a)(3) states that each container used for onsite accumulation of hazardous waste shall be labeled or marked clearly with the words "Hazardous Waste";

§262.34(c)(1)(ii) states that each container used for satellite accumulation of hazardous waste shall be marked with the words "Hazardous Waste" or with other words that identify the contents of the container.

Field Inspection Observations: A container of broken spent lamps in the CAA was labeled as universal waste but did not have a hazardous waste label. A locker in the CAA containing spill control equipment also contained hazardous wastes but was not labeled. A container of amalgam traps at the dental clinic SAA in the Medical Clinic was not labeled.

Action Taken by the Facility: In a letter dated 7 April 2011, USCG San Pedro stated that the container of broken lamps had been labeled as hazardous waste.

2. Failure to Meet Universal Waste Container Management Requirements

40 CFR §273.13(d)(1), and §273.14 (e)

Handlers of universal waste on site shall comply with the following requirements:

§273.13(d)(1)) states a handler of universal waste must contain any lamp in containers or packages that are structurally sound, and adequate to prevent breakage;

§273.14 (e) states that universal waste lamp containers in which the equipment is contained must be labeled or marked clearly with any of the phrases specified in the regulation.

Field Inspection Observations: In the Electrical Shop, a few loose spent lamps that were awaiting transport to the CAA (see Photo #8) were leaning against a wall.

AREAS OF CONCERN

If USCG San Pedro had been a RCRA LQG at the time of the inspection, the following items would have been potential RCRA violations.

Failure to Have Adequate Refresher Training

40 CFR §262.34(a)(4)

A generator may accumulate hazardous waste on-site for 90 days or less without a permit or grant of interim status provided that he complies with §265.16.

§265.16(c) Facility personnel must take part in an annual review of the additional training required in paragraph (a) of this section.

Record Review: Ms. Gregory last had 28-hour hazardous waste refresher training on May 14, 2008 and she provided a certificate and outline. Ms. Gregory also stated that she conducts annual hazardous waste training for facility personnel and last conducted this training in January 2010.

Failure to Have a Complete Contingency Plan

40 CFR §262.34(a)(4)

A generator may accumulate hazardous waste on-site for 90 days or less without a permit or grant of interim status provided that he complies with Subpart D in 40 CFR part 265.

§265.52(d) states that the contingency plan must list names of all persons qualified to act as emergency coordinator, and this list must be kept up to date.

§265.52(a) states that the contingency plan must describe the actions facility personnel must take to respond to fires, explosions, or any unplanned release of hazardous waste.

Record Review: The names of the emergency coordinators were out of date. The contingency plan did not include procedures for responses to spills, fires or explosions involving hazardous waste, although there were procedures available in other documents.

ATTACHMENT

1. Photograph Log

Attachment 1

Photograph Log

US COAST GUARD BASE SUPPORT UNIT

SAN PEDRO PHOTO LOG

DATE TAKEN: 2/9/11

TAKEN BY: M. Prescott

PHOTO #: 1

COMMENTS: View of entrance to the hazardous waste Central Accumulation Area (CAA).

SITE LOCATION: CAA Next to Bldg. 10



DATE TAKEN: 2/9/11

TAKEN BY: M. Prescott

PHOTO #: 2

COMMENTS: Broken spent fluorescent lamps in a container labeled universal wastes.

SITE LOCATION: CAA Next to Bldg. 10



US COAST GUARD BASE SUPPORT UNIT

SAN PEDRO PHOTO LOG

DATE TAKEN: 2/9/11

TAKEN BY: M. Prescott

PHOTO #: 3

COMMENTS: Containers of RCRA and CA hazardous waste and nonhazardous waste.

SITE LOCATION: CAA Next to Bldg. 10



DATE TAKEN: 2/9/11

TAKEN BY: M. Prescott

PHOTO #: 4

COMMENTS: Two drums of RCRA hazardous waste and the rest of the drums and containers are CA hazardous wastes.

SITE LOCATION: CAA Next to Bldg. 10



US COAST GUARD BASE SUPPORT UNIT

SAN PEDRO PHOTO LOG

DATE TAKEN: 2/9/11

TAKEN BY: M. Prescott

PHOTO #: 5

COMMENTS: Hazardous materials awaiting waste determinations in the spill equipment locker.

SITE LOCATION: CAA Next to Bldg. 10



DATE TAKEN: 2/9/11

TAKEN BY: M. Prescott

PHOTO #: 6

COMMENTS: Container of amalgam traps with no hazardous waste label.

SITE LOCATION: Medical Clinic



US COAST GUARD BASE SUPPORT UNIT

SAN PEDRO PHOTO LOG

DATE TAKEN: 2/9/11
TAKEN BY: M. Prescott
PHOTO #: 7

SITE LOCATION: Bldg. 51 MSST

COMMENTS: Drums of waste oil and filters regulated as CA hazardous waste (note one of the drums was open).



DATE TAKEN: 2/9/11
TAKEN BY: M. Prescott
PHOTO #: 8

SITE LOCATION: Electrical Shop

COMMENTS: Loose spent fluorescent lamps awaiting transport to the CAA.



US COAST GUARD BASE SUPPORT UNIT

SAN PEDRO PHOTO LOG

DATE TAKEN: 2/9/11

TAKEN BY: M. Prescott

PHOTO #: 9

COMMENTS: Paint stains and paint and mop buckets on storm drain.

SITE LOCATION: DC Shop



DATE TAKEN: 2/9/11

TAKEN BY: M. Prescott

PHOTO #: 10

COMMENTS: Paint and mop buckets next to a hose over a storm drain.

SITE LOCATION: DC Shop



US COAST GUARD BASE SUPPORT UNIT

SAN PEDRO PHOTO LOG

DATE TAKEN: 2/9/11

TAKEN BY: M. Prescott

PHOTO #: 11

COMMENTS: Drum of RCRA hazardous waste paint chips from boat recoating project by a contractor.

SITE LOCATION: Contractor Operation at Industrial Wharf



Attachment 2